

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DONALD R. LOVELL,)	
)	
Plaintiff,)	Case No. 3:12-cv-254
)	
v.)	Judge Sharp
)	Magistrate Judge Bryant
CHAMPION CAR WASH, LLC, and)	
TIM JONES, individually,)	Jury Demand
)	
Defendants.)	

JOINT NOTICE OF SETTLEMENT

Plaintiff Donald R. Lovell and Defendants Champion Car Wash, LLC, and Tim Jones, individually, respectfully notify the Court that all matters in controversy between them have been settled and that Plaintiff's claims should be dismissed without prejudice to the right to reopen them if the settlement is not fully consummated as agreed upon on or before September 1, 2014.

The parties request that the Court dismiss Plaintiff's remaining claims with prejudice on September 8, 2014, unless Plaintiff notifies the Court between September 4 and September 8, 2014, that Defendants have failed to consummate the agreed upon settlement, in which case Plaintiff's claims shall not be dismissed. Upon full and complete satisfaction of the settlement agreement, the parties will file a proposed agreed order of dismissal with prejudice on or before September 8, 2014.

In the event that the settlement is not consummated and Plaintiff seeks to reopen his claims, the parties agree that those claims shall remain timely and that Defendants shall not assert any defense based upon this dismissal without prejudice or the reopening of Plaintiff's claims, specifically including any defense based upon any statute of limitation or lack of

jurisdiction. The parties further agree that the Court retains jurisdiction of this case for the purpose of enforcing their settlement agreement.

Respectfully submitted,

s/Douglas B. Janney III

Douglas B. Janney III (BPR No. 19112)
2002 Richard Jones Road
Suite B-200
Nashville, Tennessee 37215
(615) 742-5900

Attorney for Plaintiff

s/Richard J. Braun

Richard J. Braun (BPR No. 10346)
BRAUN & ASSOCIATES PLLC
501 Union Street, Suite 500
Nashville, Tennessee 37219
(615) 259-1550

Attorney for Defendants